

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

Civ. Action No.: 14-cv-00029-AB

National Football League and
NFL Properties, LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**THE NATIONAL FOOTBALL LEAGUE AND NFL PROPERTIES LLC'S
MOTION FOR THE APPOINTMENT OF A SPECIAL INVESTIGATOR**

The National Football League and NFL Properties, LLC (together, the "NFL Parties") respectfully move, pursuant to Federal Rule of Civil Procedure 53, for the immediate appointment of a Special Investigator to assist the Claims Administrator and the Court in investigating the submission of fraudulent claims to the NFL Concussion Settlement Program and recommending appropriate sanctions.

Dated: April 13, 2018

Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

/s/ Brad S. Karp

Brad S. Karp

Bruce Birenboim

Lynn B. Bayard

Richard C. Tarlowe

Sarah A. Istel

1285 Avenue of the Americas

New York, NY 10019-6064

Tel: (212) 373-3000

Email: bkarp@paulweiss.com

*Attorneys for Defendants the National
Football League and NFL Properties LLC*